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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LESLIE LILIEN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

OLAPLEX HOLDINGS, INC., et al.,

Defendants.

Case No. 2:22-cv-08395-SVW(SKx)

CLASS ACTION

**NOTICE OF MOTION AND
LEAD PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: September 8, 2025

Time: 1:30 p.m.

Courtroom: 10A

Judge: Hon. Stephen V. Wilson

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 8, 2025, at 1:30 p.m., or as soon thereafter as it may be heard, if a hearing is required by the Court, Court-appointed Lead Plaintiff Arkansas Teacher Retirement System ("Lead Plaintiff"), on behalf of itself and all members of the proposed Settlement Class, will move this Court for an

1 Order, pursuant to Federal Rule of Civil Procedure 23(e): (i) preliminarily approving
2 a proposed settlement of the above-captioned class action (the “Settlement”); (ii)
3 approving the proposed long-form Notice of Pendency of Class Action, Proposed
4 Settlement, and Motion for Attorneys’ Fees and Expenses, Proof of Claim and
5 Release form, Postcard Notice, and Summary Notice of Pendency and Proposed
6 Settlement of Class Action and Motion for Attorneys’ Fees and Expenses, attached as
7 Exhibits A-1 through A-4 to the proposed Preliminary Approval Order, filed
8 herewith, as well as the methods of notice; (iii) setting a date and time for the final
9 Settlement Hearing; (iv) appointing Epiq Class Action & Claims Solutions, Inc. as
10 the Claims Administrator to provide all notices, process Claim Forms, and to
11 administer the Settlement; and (v) granting such other and further relief as this Court
12 deems just and proper.

13 Pursuant to Local Rule 7-3, I have conferred with counsel for the Defendants,
14 and Defendants do not oppose the relief requested by the motion. Accordingly, we
15 respectfully submit that the Motion may be suitable for decision on the papers and in
16 advance of a September 8, 2025 hearing date.

17 This motion is supported by the accompanying memorandum of points and
18 authorities, the Declaration of Lauren A. Ormsbee, dated August 1, 2025, and the
19 exhibits attached thereto, including the Stipulation and Agreement of Settlement,
20 dated August 1, 2025.

21 A proposed Order Granting Preliminary Approval of Class Action Settlement,
22 Approving Form and Manner of Notice, and Setting Date for Hearing on Final
23 Approval of Settlement, with annexed exhibits, which was negotiated by the Parties,
24 is also submitted herewith.

25
26 Dated: August 1, 2025

LABATON KELLER SUCHAROW LLP

27 By: /s/ Lauren A. Ormsbee
28 Lauren A. Ormsbee (*pro hac vice*)

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9 *Attorneys for Lead Plaintiff Arkansas*
10 *Teacher Retirement System and the*
11 *Proposed Settlement Class*
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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List served via ECF on all registered participants only.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 1, 2025

/s/ Lauren A. Ormsbee

Lauren A. Ormsbee

Mailing Information for *Leslie Lilien v. Olaplex Holdings, Inc. et al.*, Case 2:22-CV-08395-SVW(SKX)

Electronic Mail Notice List:

The following are those who are currently on the list to receive e-mail notices for this case.

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